

1 CHARLES THOMPSON, State Bar No. 139841  
 2 thompsoncha@gtlaw.com  
 3 DAVID S. BLOCH, State Bar No. 184530  
 4 blochd@gtlaw.com  
 5 ANTHONY E. GUZMAN II, State Bar No. 311580  
 6 guzmanan@gtlaw.com  
 7 MELISSA J. KENDRA, State Bar No. 291905  
 8 melissa.Kendra@gtlaw.com  
 9 GREENBERG TRAURIG, LLP  
 10 101 Second Street, Suite 2200  
 11 San Francisco, California 94105  
 12 Telephone: 415.655.1300  
 13 Facsimile: 415.707.2010

14 Attorneys for Defendant / Counter-Claimant  
 15 BYTEDANCE INC.

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 YINTAO YU, an individual,

19 Plaintiff,

20 vs.

21 BYTEDANCE INC., a Delaware corporation;  
 22 SHUYI (SELENE) GAO, an individual,

23 Defendants.

24 Case No. 3:23-cv-04910-SI

25 **NOTICE OF MOTION AND MOTION FOR  
 26 SANCTIONS AGAINST CHARLES JUNG  
 27 AND JAIME DORENBAUM**

28 [Originally San Francisco Superior Court  
 No. CGC-23-608845]

1 Date: April 11, 2025

2 Time: 10:00 a.m.

3 Location: Ctrm. 1,  
 4 450 Golden Gate Ave.  
 5 San Francisco, CA 94102

6 BYTEDANCE INC., a Delaware  
 7 Corporation,

8 Counter-Claimant

9 vs.

10 YINTAO YU, an individual,

11 Counter-Defendant.

## **ADDITIONAL COUNSEL**

DEMERY RYAN, State Bar No. 217176  
dryan@littler.com  
LITTLER MENDELSON, P.C. 2049  
Century Park East, 5th Floor  
Los Angeles, California 90067  
Telephone: 310.553.0308  
Facsimile: 800.715.1330

GREGORY ISKANDER, State Bar No. 200215  
giskander@littler.com  
LITTLER MENDELSON, P.C.  
Treat Towers 1255 Treat Boulevard, Suite 600  
Walnut Creek, California 94597  
Telephone: 925.932.2468  
Facsimile: 925.946.9809

Attorneys for Defendant  
SHUYI (SELENE) GAO

1                   **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2                   **PLEASE TAKE NOTICE** that on April 11, 2025, at 10:00 a.m., or as soon thereafter as the  
 3 Motion may be heard in Courtroom 1 of the United States District Court for the Northern District of  
 4 California, San Francisco Courthouse, 450 Golden Gate Avenue, San Francisco, California 94102,  
 5 Defendants ByteDance Inc. (“BDI”) and Shuyi Gao (collectively, “Defendants”) will and hereby do move  
 6 this Court for an Order sanctioning Charles Jung and Jaime Dorenbaum (collectively, “Yu’s Counsel”)  
 7 pursuant to 28 U.S.C. § 1927 and/or this Court’s inherent powers.

8                   Defendants request monetary sanctions in an amount of at least of \$6,280,077.38 and any other  
 9 sanction this Court deems appropriate against Jung and Dorenbaum because they unreasonably and  
 10 vexatiously multiplied the proceedings in this case by, amongst other things: (1) failing to conduct any  
 11 investigation or perform any due diligence regarding the anonymous declarant; (2) making false  
 12 representations and/or reckless misrepresentations—some under penalty of perjury—to this Court  
 13 including but not limited to those regarding the anonymous declarant; (3) engaging in tactical maneuvers  
 14 designed to avoid the arbitration process to which their client Yintao (Roger) Yu expressly consented  
 15 during his employment with BDI and ultimately voluntarily submitted his claims; and (4) attempting to  
 16 excuse their misconduct with more misrepresentations rather than correct their meritless positions.

17                   Though the Court granted terminating sanctions (ECF 246), judgment has not been entered in light  
 18 of the ongoing binding arbitration and hence this Motion is timely under Civ. L.R. 7-8 (d).

19                   This Motion is based on this Notice, the accompanying Memorandum of Points and Authorities,  
 20 Declaration of Charles O. Thompson, Proposed Order, the papers and records on file herein, any oral  
 21 argument, and such other evidence as this Court may deem appropriate to consider.

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1 Respectfully submitted,

2 DATED: March 6, 2025

3 GREENBERG TRAURIG, LLP

4 By 

5 Charles O. Thompson

6 David S. Bloch

7 Anthony E. Guzman II

8 Melissa J. Kendra

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Attorneys for Defendant  
BYTEDANCE INC.